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*Attorneys for Defendant Manhattan Sheraton  
Corporation*

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----X  
JOSEPH BEJJANI, et al.,

Plaintiffs,

- against -

07 Civ. 10729 (HB) (DCF)

MANHATTAN SHERATON CORPORATION d/b/a ST.  
REGIS HOTEL and NEW YORK HOTEL & MOTEL  
TRADES COUNCIL, AFL-CIO,

Defendants.  
-----X

**NOTICE OF MOTION TO DISMISS THE  
SECOND AMENDED COMPLAINT**

**PLEASE TAKE NOTICE** that upon the Second Amended Complaint in this action and the Declaration of George Greene dated May 9, 2008, along with the exhibits attached thereto, Defendant Manhattan Sheraton Corporation, by its undersigned attorneys, will move this Court at the United States Courthouse, 500 Pearl Street, New York, New York, at a time and date to be set by the Court, for an order, pursuant to Rules 12(b)(1), 12(b)(6) and 12(b)(7) of the Federal Rules of Civil Procedure, dismissing the complaint in this action, and for such other and further relief as the Court may deem just, proper, and equitable.

Dated: New York, New York  
May 12, 2008

Respectfully submitted,

HOGAN & HARTSON L.L.P.

By: /s/  
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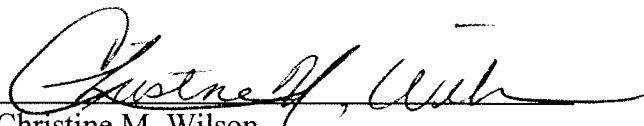
Defendants.  
-----X

CERTIFICATE OF SERVICE

I, Christine M. Wilson, certify under penalty of perjury that on this 12<sup>th</sup> day of May, 2008, I caused to be served true and correct copies of defendant Manhattan Sheraton Corporation's Notice of Motion to Dismiss the Second Amended Complaint, Memorandum of Law in Support of its Motion to Dismiss the Second Amended Complaint, and the Declaration of George Greene dated May 9, 2008, along with exhibits attached thereto, to be served by first class U.S. mail and by electronic means to the following counsel of record:

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